

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN

* CIVIL NO.: 24CV01136

Plaintiff

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V

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McCONNELL VALDÉS, LLC;
ANTONIO A. ARIAS-LARCADA, ET AL

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**PLAINTIFF'S NOTICE OF COMPLIANCE WITH DISCOVERY DEADLINES
AND TO REITERATE DEFENDANTS' CONTINUING DISCOVERY VIOLATIONS**

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, Alan Goldman, through his undersigned counsel and respectfully States and Prays as follows:

1. On February 27th, 2025, this Honorable Court entered the Scheduling Order (Document Number 91), establishing deadlines for, *inter alia*, the service of expert witnesses' disclosures, interrogatory responses and responses to requests for production of documents.
2. Plaintiff, Alan Goldman hereby serves notice that Plaintiff fully and timely complied with his discovery obligations, as mandated by Document Number 91. Specifically:
 - a. By April 18, 2025, Plaintiff, Goldman served upon Defendants his four (4) expert witnesses' reports, complete with the disclosures mandated by Federal Rule of Civil Procedure 26(a)(2)(B), including their respective qualifications, compensation information and anticipated subject matter of their testimonies.

- b. On **April 28, 2025**, Plaintiff, Goldman served upon Defendants his supplemental, enhanced, detailed and comprehensive written responses, addressing Defendants' objections to his prior interrogatory answers, providing a 22-page supplemental response prior to the Court's ordered deadline for written interrogatory responses.
3. Plaintiff Goldman has therefore fully cooperated in the court-mandated discovery proceedings and has satisfied his obligations imposed under the Scheduling Order, thereby demonstrating his good faith and his diligent adherence to the Federal Rules of Civil Procedure and the directives of this Court.
4. **Conversely**, and regrettably, Plaintiff, Goldman must report that Defendants, **Antonio A. Arias-Larcada, María Beale and McConnell Valdés, LLC** have **willfully refused to comply with any of their discovery obligations**.
5. Despite having been served with two interrogatories and two requests for production of documents during **September/October 2024** and again in **January 2025**, Defendants, Arias, Beale and **McConnell Valdés, LLC** have **failed to provide a single responsive answer** and have failed to provide one single document pertaining to these discovery requests.
6. In Document Number 90, Defendants, Arias, Beale and **McConnell Valdés, LLC**, through their counsel, Mr. Manuel San-Juan-DeMartino, **expressly averred to the Court and to Plaintiff** that they would respond to **both sets** of interrogatories and both requests for production of documents, **not later than on March 26, 2025**, and stated in their motion: "*Motion for extension of time until March 26, 2025 to Answer*

Interrogatories and Requests for Production of Documents, Motion for Extension of Time until March 26, 2025 to File Answer filed by Manuel San-Juan-DeMartino on behalf of Antonio A Arias-Larcada, María Beale, Conjugal Partnership Arias-Beale, McConnell Valdes, LLC."

7. However, after allowing the extended deadline of **March 26, 2025**, to pass **without any response or further communication**, Defendants have continued to refuse to provide any discovery responses, thereby obstructing Plaintiff, Goldman's efforts to move discovery forward.
8. Instead, on **April 8, 2025**, said Defendants filed **Document Number 118**, wherein they improperly sought an **indefinite stay of discovery** without ever fulfilling their prior obligations or honoring their own commitments to the Court and to Plaintiff.
9. To date, Defendants, Arias, Beale and **McConnell Valdés, LLC**, have wholly failed to provide any answers to the interrogatories served during September and October 2024, and in January 2025, and have failed to provide any responses to Plaintiff's requests for production of documents that were served in those same periods, thereby **defiantly disregarding this Court's Scheduling Order** and their own responsibilities under the Federal Rules of Civil Procedure.
10. Plaintiff, Goldman has filed a separate, detailed opposition to Defendants' Motion for Stay, outlining Defendants' dilatory tactics, obstructionist activities and persistent non-compliance with this Court's discovery order.
11. It bears particular emphasis that Defendant, **María Beale** is currently licensed as a **real estate broker**, and that Defendant, **Antonio Arias** is currently a licensed **attorney** at

law, and that Defendant, **McConnell Valdés, LLC** is Defendant, Arias' supervisory firm, thus making their intentional disregard of the discovery process more egregious, given their respective professional and legal obligations to adhere to court orders, especially when this case concerns the legal malpractice incurred by Defendants.

12. Plaintiff, Goldman respectfully submits this Motion, not merely to place on the record of this case that Plaintiff has fully complied with his discovery obligations, but also to disclose and preserve a complete and accurate record of Defendants, Arias, Beale and **McConnell Valdés, LLC**'s ongoing discovery abuses, for which sanctions are now adequate and necessary.

WHEREFORE, Plaintiff, Alan Goldman respectfully requests from this Honorable Court, to:

- 1) **Take Notice** of Plaintiff's compliance with the discovery deadlines and obligations, as set forth in Document Number 91;
- 2) **Take Notice** of Defendants, Arias, Beale and **McConnell Valdés, LLC**'s continued and willful non-compliance with Court-ordered discovery obligations; and
- 3) **Grant such further relief as this Court deems just and proper**, in the interests of fairness and judicial efficiency.

RESPECTFULLY SUBMITTED.

In Miami, Florida, on the 29th day of April 2025.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of April 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

s/Francisco M. López-Romo
FRANCISCO M. LOPEZ-ROMO
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